UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE

ADRIAN L LARIVIERE,

Plaintiff,

v.

CIVIL NO. 2:14-cv-109-JDL

JPMORGAN CHASE BANK NATIONAL ASSOCIATION,

Defendant.

<u>DEFENDANT JPMORGAN CHASE BANK, N.A.'S CONSENT MOTION TO ENLARGE</u> <u>STAY OF PROCEEDINGS PENDING SETTLEMENT TO SEPTEMBER 30, 2014</u>

Defendant JPMorgan Chase Bank, National Association ("Chase"), by and through counsel, Preti, Flaherty, Beliveau & Pachios, LLP, respectfully moves this Court to enlarge the stay of proceeding pending settlement by fifteen (15) days to September 30, 2014. In support, Chase states as follows:

- 1. On July 30, 2014, this Court granted Plaintiff Adrian Lariviere's ("Lariviere") consent motion to stay proceedings pending settlement. The purpose of the stay was to allow counsel to finalize the terms of settlement and file a stipulation of dismissal by September 15.
 - 2. The parties have finalized the terms of the settlement and are awaiting signatures.
- 3. The parties anticipate the settlement to be closed no later than September 30, 2014.
 - 4. Counsel have conferred and Lariviere consents to this motion.

WHEREFORE, Defendant JPMorgan Chase Bank, N.A. respectfully requests this Court grant its consent motion and enlarge the stay of proceedings by fifteen (15) days to September 30, 2014.

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Respectfully submitted,

JP MORGAN CHASE BANK, N.A.

By its attorneys,

PRETI, FLAHERTY, BELIVEAU & PACHIOS, LLP

Dated: September 9, 2014 By: /s/Adam J. Shub

Adam J. Shub, Esq., Bar No. 4708 Attorney for Defendant

JP Morgan Chase Bank, N.A.

Preti Flaherty Beliveau & Pachios, LLP One City Center PO Box 9546 Portland ME 04112-9546 207-791-3000 ashub@preti.com

CERTIFICATE OF SERVICE

I hereby certify that on 9/9/14 I electronically filed the above document via the ECF filing system.

Date: _9/9/2014_ /s/ Adam J. Shub

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